

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
	:	
	:	CRIMINAL ACTION
v.	:	
	:	NO. 99-504
JEMEL STEWARD RYAN	:	

GOVERNMENT'S MOTION FOR A CONTINUANCE

I. PRELIMINARY STATEMENT

The United States of America, through its counsel Michael R. Stiles, United States Attorney for the Eastern District of Pennsylvania, and Floyd J. Miller, Assistant United States Attorney, hereby respectfully move this Court for an Order which: (a) extends the September 27, 1999 pretrial conference to October 11, 1999 and (b) extends the trial date from November 1, 1999 to November 15, 1999. Government counsel has spoken with defense counsel about this request. Defense counsel has no objections to the request

II. DISCUSSION

The basis for the government's request is necessitated by the following upcoming trials.

A. Trial: United States v. Raheem Broadnax (CR# 99-46)

On September 27, 1999, undersigned counsel is scheduled to start a trial before Senior United States District Judge Charles R. Weiner in United States v. Raheem Broadnax. The defendant in this case was indicted in January, 1999. Because the case has been continued three times by Judge Weiner, it is unlikely that he would be willing to continue the case again. The Broadnax trial should not last more than 3 days.

B. Trial: United States v. Jorge Colon (CR# 99-CR-291)

On October 4, 1999, undersigned counsel has a trial before Judge Bruce Kauffman. The defendant has repeatedly stated that he will not plead guilty and will insist on proceeding to trial. The trial of this case should not last more than three days.

C. Trial: United States v. Michael Alexander (CR# 99-311)

On November 1, 1999, undersigned counsel has a trial before Judge Katz. This case, which has been continued twice, conflicts with the date set by this Court for the trial of Defendant Ryan. This trial should not last more than three (3) days. Accordingly, the Court is respectfully urged to continue the Ryan trial date until November 15, 1999.

III. CONCLUSION

For all of the foregoing reasons, the government hereby respectfully urge the Court to grant its motion for continuance.

Respectfully submitted,

MICHAEL R. STILES  
United States Attorney

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FLOYD J. MILLER  
Assistant United States Attorn

CERTIFICATE OF SERVICE

I, Floyd J. Miller, do hereby certify that a copy of the Government's Motion For A Continuance of the pretrial conference was served upon counsel for the defendant this \_\_\_\_ day of \_\_\_\_ by placing a copy of the same in an envelope with sufficient postage affixed thereto and addressed as follows:

Luis A. Ortiz, Esquire  
Assistant Federal Defender  
Defender Association of Philadelphia  
Federal Court Division  
Suite 800 - Lafayette Building  
437 Chestnut Street  
Philadelphia, PA 9106-2414

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FLOYD J. MILLER